CASE WESTERN RESERVE UNIVERSITY DEPARTMENT OF ENVIRONMENTAL HEALTH & SAFETY RADIATION SAFETY

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INTRODUCTION

This report is submitted to the president and designated members of the senior administration of the University as required by the Radiation Safety Committee's (RSC) operating guidelines and Case Western Reserve University's State of Ohio (Nuclear Regulatory Commission Agreement State) Broad Scope License. The report summarizes the activities of the Radiation Safety Office (RSOF) of the Department of Environmental Health & Safety (EHS) at Case Western Reserve University (CWRU). Its contents cover the period from 7/1/2021 - 6/30/2022.

<u>SUMMARY</u>

DEPARTMENT STRENGTHS

The RSOF is comprises of a staff with extensive and diverse backgrounds who can address and resolve a wide range of issues faced in radiation safety at CWRU. The RSOF has developed programs that meet or exceed regulatory requirements. These programs proactively anticipate new safety requirements by promulgation of new programs through the RSC of the University. The success of these agendas is enhanced by excellent administrative support.

DEPARTMENT OPPORTUNITIES

The RSOF enjoys excellent interaction with other departments that are developing safety-related initiatives and outside agencies that are dedicated to improving environmental quality in our facilities.

RADIATION SAFETY ACCOMPLISHMENTS FOR 2021-2022

Over the past year, the radiation safety division of EHS continued to improve the effectiveness of the radiation safety Program. Notable new accomplishments include:

- x Dosimetry: Reduce quantity of unreturned badges
- x Training: Implement live Zoom recordings of in-person trainings to allow at home/quarantined individuals to participate.
- x Appointment of a New Radiation Safety Officer, Felice T. Porter, to replace W. David Sedwick, who will retire 6/30/2022. Dr. Sedwick has been RSO and Director of Radiation Safety since 1996.
- x Generated in-house savings accrued from meter calibration, recycling and decay-in-storage programs amounting to more than \$17,410 in 2021-2022 through its services to the research community at CWRU.

RADIATION SAFETY GOALS FOR 2022-2023

The continuing goal of the radiation safety Program is to position EHS for more effective interaction with the educational and research goals of the University through training and training development. A secondary goal is to increase the positive impact of CWRU safety programs within and around the adjacent community through educational and programmatic interaction with local partners and emergency responders. Specific efforts currently address:

x Planning and Preparation for Irradiator disposal as well as review of possible purchase of an X-Ray Irradiator the Office of Radiological Security (ORS).

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RAM and/or RGE are received and/or stored at the following sites:

- x Shipping and receiving, 2232 Circle Drive, Cleveland, Ohio 44106Wolstein Research Building, 2103 Cornell Road, Cleveland, Ohio 44106
- x Health Education Campus (HEC) Dental Clinic, 9601 Chester Avenue, Cleveland, Ohio 44106 (no RAM)
- x Health Education Campus (HEC) Main Building, 9501 Euclid Avenue, Cleveland, Ohio 44106 (no RAM)

PURPOSE FOR RAM USE

The majority of isotope used at the University is for biomedical research. The most typical isotopes used are ¹⁴C, ³H, ¹²⁵I, ³²P, ³³P, and ³⁵S. Isotopes used in sealed sources contained within irradiators, scintillation counters, gamma counters, check sources and calibration standards are most commonly ¹³⁷Cs, ¹³³Ba, and ²⁴¹Am.

RADIATION SAFETY PROGRAM - RESPONSIBLE PARTIES

RADIATION SAFETY COMMITTEE

The RSC sets policy for the use of RAM for the University's committee. Members of this committee are appointed by the president of the University and has responsibility for monitoring and enforcing compliance with the University's radiation safety program as outlined in the University's ODH broad scope license. RSC members are chosen from diverse disciplines to provide comprehensive expertise. The committee reviews all applications for use of RAM.

The 2021-2022 RSC membership and their affiliations are listed below. The ODH is informed of committee membership changes. The committee is also aided by input from ex-officio (non-voting) and visiting members (non-voting).

VOTING MEMBERS

Dr. Thomas McCormick Dept. of Dermatology BRB 530 LC - 4926 Term Expires: 10/15/2023 Chairperson Term Expires:10/15/2023	Dr. W. David Sedwick Radiation Safety Officer (RSO) Dept. of Medicine (Emeritus) EHS - Service Building, First Floor LC - 7227 Term Expires: 6/30/22 (Retired as RSO)	Dr. Saba Valadkhan Dept. of Molecular & Microbiology HG Wood 210A LC - 4960 Term Expires: 10/1/2022
Dr. Colleen Croniger Dept. of Nutrition BRB 925 LC - 4954 Term Expires: 10/1/2022 Dr. Zhenghong Lee Dept. of Radiology Bolwell Building S107 LC - 1714 Term Expires: 9/1/2023	Dr. Suhrim Fisher Animal Resource Center BRB RB5P LC - 4925 Term Expires: 9/1/2023	Dr. Donny Licatalosi Dept. of RNA Center HG Wood 106 LC - 4973 Term Expires: 10/17/2021 Dr. Christine Duval Dept. of Chemical Engineering AW Smith Building 147 LC - 7217 Term Expires: 9/1/2023

EX-OFFICIO MEMBERS

Richard Jamieson	Felice T. Porter	Marc Rubin
Vice President	EHS Asst. Dir./Asst. RSO	EHS Senior Director
Dept. of Campus Services	Quality Assurance Specialist	Service Bldg.
Administration	Service Bldg.,	First Floor
Adelbert Hall 229	First Floor	LC - 7227
LC - 7173	LC - 7227	

The RSC acts as an advisory and enforcement body to ensure that all RAM are safely used in accordance with the 'As Low As Reasonably Achievable' (ALARA) principles. The committee conducts audits each trimester, which address programmatic compliance. The RSC also conducts an annual audit in which the entire program is reviewed.

The audits ensure that:

- x Specific program components conform to the licensed program as described in the CWRU Radiation Safety Manual and License
- x Accurate documentation for program conformance and license compliance is maintained
- x Adequate training is provided for all classes of workers
- x Oversight for RSOF activities is maintained through RSC familiarity with the daily function of the University radiation safety program.

The RSC met via Zoom on 6 occasions during the 2021-2022 fiscal years to review applications for radioisotope use and action on other business. Two were quorum meetings. Six RSC meetings were canceled because agenda items did not require immediate address. The minutes of the RSC meetings and executive committee actions are available in the RSOF, through the RSC or through the University's administration. Laboratory occupation during the post-Covid-19 pandemic was increased significantly along with the number of safety topics requiring address by the RSC. However, the presence of radioactive materials and use of irradiators required continuing audit activities over this period by both the RSOF staff and the RSC members.

APPLICATIONS	21/ 22	20/ 21	19/ 20	18/ 19	17/ 18	16/ 17	15/ 16	14/ 15
New AU	1	1	0	2	3	3	1	3
Additional Isotopes	2	3	2	1	2	0	2	2
Radioisotope use in Animals	1	1	1	0	2	2	4	1
Sealed Sources	2	3	0	0	1	5	0	6
Sealed Sources Update	1	1	2	2	1	0	0	0
AU Reactivation	0	0	0	0	0	0	0	0
Possession Limit Increase	0	0	0	0	0	0	0	2
AU Protocol Update	5	4	3	16	4	7	2	7
TOTAL APPROVALS	12	13	8	21	13	17	9	21

Important topics acted upon or discussed by the RSC:

- x RSC extended Thanks and Gratitude to W. David Sedwick for service since 1996. (6/2022)
- x June annual audits completed. (6/2022)
- x Dispatch renovation continues, and relocation is planned for the end of 2022. (6/2022)
- x The MOU with UH was accepted and signed by W. David Sedwick (CWRU RSO) and Ahmad Hatami (UH RSO). (6/2022)
- x One Dental Clinic application was approved through UH. (6/2022)
- x No fetal monitoring for this quarter. (6/2022)
- x CWRU RSO, W. David Sedwick, announced his retirement from the RSC on 6/30/2022 after 30 years on the RSC and 27 years as RSO. Felice T. Porter will be designated as the RSO position on 7/1/2022. (6/2022)
- x Laser Summary completed. (6/2022)
- x A RSC Quorum Meeting for Administrative Representative signatures was completed for RAM applications. (5/2022)
- x Evacuation Incident for the Service Building was explained. It occurred following a chemical leak from water treatment in the basement. (5/2022)

- x A poll of IRR users regarding switching to an X-Ray IRR was completed. The result was a 50/50 split. (5/2022)
- x RSC Member R. Michael Sramkoski retired in April 2022 and was recognized with a plaque for his 14 years of service on the RSC. (3/2022)
- x Possible replacement of Cesium Irradiators with X-Ray Irradiators was reviewed for advantages and disadvantages. (3/2022)
- x The CWRU COVID-19 Face mask protocol was changed which required masks for Clinical, Lectures, and laboratories. Campus members and visitors no longer required to wear masks. (3/2022)
- x Completed ORS Training with Dispatchers. (3/2022)
- x Completed IRR Quarterly Security Update, Quarterly HR Review of IRR personnel, RSOF Irradiator Audits,

The AUs and the RSOF share responsibility for safety. The AU is directly responsible for the safe use of RAM in the laboratory. The radiation safety office is responsible for ensuring that appropriate safety procedures are implemented and that AUs are fulfilling their responsibilities for monitoring safety during experiments carried out in their laboratories. Audits of laboratories are conducted by the RSOF to ensure compliance with CWRU's license. The audit program includes routine unannounced inspections of each AU's laboratory.

ADMINISTRATIVE CONTROLS

Administrative controls are established and approved by the RSC for laboratories where RAM are/is used. Controls include signage, training, laboratory access and dosimetry. Written procedures document procurement, use and the disposal of all RAM at the University.

General safety compliance enforcement procedures prescribe sanctions for those who

RADIATION ACTIVE (RA)

AUs who actively use RAM are "radiation active." Laboratories of these AUs are inspected by the RSOF three times per year. Audits are more frequent if there are particular concerns in a laboratory. A listing of AUs and their RAM can be found in the APPENDIX.

RADIATION INACTIVE (RI)

These AUs do not currently use or possess RAM.

RADIATION ACTIVE STORAGE MODE (SM)

AUs who did not actively use RAM, but who wish to maintain their RAM inventory will, by their request, have their inventory placed in storage mode status this fiscal year.

DEPARTED (D)

AUs, who no longer carry out research at CWRU, and whose laboratories have been decommissioned for RAM use, have been placed in the departed category this fiscal year.

AUs	21/22	20/21	19/20	18/19	17/18	16/17	15/16	14/15
RA	32	35	44	47	49	50	54	62
SM	16	18	16	18	20	15	20	8
RI	5	5	2	2	7	5	5	3
D	1	1	2	3	5	5	2	6
Total in Program	48	53	64	70	69	65	74	70

MASTER ISOTOPE LIST

The master isotope (see APPENDIX) list shows the University's isotope inventory, the sum of the AUs' inventory (excluding sealed sources) and the sum of the AUs' possession limits relative to the National Regulatory Commission/ODH registration limit.

AU RADIOISOTOPE INVENTORY

The radioisotope inventory report (see APPENDIX) lists researchers, along with the amount of RAM material each is authorized to use, each AUs' possession limits and the activity of isotopes on hand.

RADIATION SAFETY OFFICE (RSOF)

STAFFING

The RSOF operated under University approval with the following positions:

RSO (1) Specialist positions (4)

Department assistant (1) Asst. director/asst. RSO/quality assurance specialist (1)

Student (1)

Training and education are central to our department's goal in developing diversified skills among our personnel who are required to respond to safety incidents and for maintenance of regulatory mandates. Specialists are encouraged to attend training and continuing education. Seminars, training, and conferences attended or completed during 2021-2022 included radiological instrument training, RCRA selected hazardous waste training, 8-hour HAZWOPER refresher training and hazardous materials transportation security awareness. Training was provided by Zoom courses during the past year.

EHS staff are responsible for maintaining the EHS website that houses all online departmental training programs and schedules, safety manuals, safety newsletters, safety data sheets and safety information resources. The website is an essential resource for the campus community that requires continuous updating. EHS staff also monitors and backs up all departmental databases.

EHS EMAIL

Since implementing the EHS email, case.edu/ehs and cwruehs@gmail.com, the number of inquiries and safety concerns raised by CWRU personnel has averaged fifteen emails per day. This communication has led to swift response and follow-up of safety concerns reported by our user community.

To report concerns of unethical activity, employees may contact the integrity hotline and provide information anonymously. They can also call 866.483.9367 or go to https://www.caseintegrityhotline.com. They are encouraged to give the date, time, location, and any other pertinent information concerning the incident.

TRAINING SESSIONS

It is the responsibility of the RSC to ensure that individuals using RAM are adequately trained to keep doses to personnel and releases to the environment per ALARA (As Low As Reasonable Achievable). The RSOF provides training for all personnel that use RAM or RGE/X-ray. Initial training must be completed before use of any radioactive materials or RGE/X-ray equipment. Annual retraining is required for the continued use of RAM. Ancillary workers (non-radiation workers), who occasionally have contact with RAM, are retrained annually. Personnel who are trained include:

ΑU

An AU is a faculty member who has been approved by the RSC to use RAM.

RADIATION WORKER

A radiation worker is any person who uses RAM under the supervision of an AU.

ANCILLARY WORKER

An ancillary worker is a non-radiation worker who may have contact with laboratories or classrooms where RAM is used. This includes individuals working in facility services, protective services, in-house and contract custodial services, shipping/receiving, the ARC and research department assistants. During orientation, non-laboratory personnel are required to attend training that includes a radiation safety component.

RADIATION GENERATING EQUIPMENT (RGE) WORKER

An X-ray worker is any person who uses RGE as part of the research program of an AU.

IRRADIATOR USERS

Personnel using irradiators are required to attend initial radiation safety training conducted by the RSOF and site-specific training with the manager of the irradiator. An irradiator worker is any person who has met the requirements for unescorted room access, including background and fingerprint checks, radiation safety, and site-specific laboratory safety training.

TRAINING

The RSOF keeps a record of all dates of training, attendees, and content of training. Records of refresher trainings offered online are also maintained. Classes and online sessions attended are essential components of CWRU's safety philosophy. Training is audited on a monthly basis by the assistant RSO to ensure compliance. The RSOF maintains both a program description and other pertinent safety training materials for this purpose. It also monitors on-site training for irradiator use.

New isotope user training classes are offered at least two times per month. Annual radiation safety retraining is done online. X-ray training classes are conducted once a month. AUs are responsible for machine and performance-specific annual refresher training for workers who use X-ray equipment in their laboratory programs. Fluoroscopy users are required to complete a fluoroscopy training module (kindly provided by UH Cleveland Medical Center) in addition to the general X-ray and site-specific trainings. Fluoroscopy Right-To-Know training is provided on an as-needed basis to individuals who desire to observe fluoroscopy procedures. Additionally, there are monthly training classes for users of Class 3B and Class 4 lasers. The RSOF requires annual retraining for all workers involved with these units and this training is offered online.

departments, and contractor workers. Employees who do not complete training are restricted from working in areas where RAM are used.

TRAINING	21/22	20/21	19/20	18/19	17/18	16/17	15/16	14/15
Radiation	70	69	108	143	133	118	61	92
Online	217	258	298	398	342	349	563	615
Retraining	_							
X-ray	7	15	12	32	22	43	58	50
Ancillary	1764	1651	725	1561	710	741	619	279
Laser	71	30	58	66	59	40	46	41
Laser Online	62	42	48	40	68	22	67	27

Over 2,191 laboratory workers were trained through the Radiation Safety Program in 2021-2022, which is a high point over the last five years. This increase reflects an effort on the part of the RSOF to provide full training instead of ancillary training to all workers for laboratories where isotope is in active use.

FACILITIES AND EQUIPMENT

CWRU administration and the RSC ensure that appropriate facilities, equipment, and trained personnel are available for the safe operation, storage, and disposal of licensed material. The RSO and assistant RSO are responsible for overseeing the review of applications and inspection of all facilities, equipment and personnel that use licensed material. Facilities that are available at CWRU for the use of licensed material include:

AW Smith Bingham Biomedical Research **Bishop** Bolwell DeGrace Old Dental Glennan **HEC Dental** HG Wood **HEC Main** Lerner Tower Kent Hale Smith Med East/Robbins Millis Olin Pathology Rockefeller Service Wearn West Quad (CCSB) White Wickenden Wolstein Research Wood Research Tower

LABORATORIES

Radiation Safety Office (RSOF):

Facilities and equipment used by the RSOF to support laboratory inspection or isotope storage are in the service building on the first floor, the School of Medicine (DOA990) and the Wolstein Building (1118, 1119, & 1120).

RSOF Laboratory:

The RSOF is in the service building on the first floor, 2220 Circle Drive. The laboratory in the RSOF is equipped with a Perkin Elmer Tricarb 4910 liquid scintillation counter (additional machines are in both radioactive waste facilities) and a Packard Cobra II Auto gamma counter. The RSOF maintains bioassay equipment consisting of a single-channel analyzer and a detector for monitoring thyroid uptake of ¹²⁵I. The department also has a multi-channel analyzer with a sodium iodide detector. These instruments are used for bioassays and the quantification of air samples for the Environmental Protection Agency (EPA) audits as well as for identification of unknown isotopes found during radiation inspections. The RSOF laboratory also houses a chemical hood, survey meters, a multi-channel analyzer (MCA) that was upgraded (2016) to a universal serial bus (USB) version, new software & computer, decontamination supplies and essential analytical and calibration equipment. A Perkin Elmer 2470 automatic gamma counter (Wallac Wizard 2) was acquired.

Radioactive Waste Facilities:

Medical School Waste Facility (DOA990):

This facility has a separate office and a process/storage room for radioactive material and disposal activities. This facility is maintained at negative pressure and has a filtered air exhaust system. It also has a waste compactor, waste shredder, chemical and walk-in hood, survey meters, liquid scintillation counter, air monitoring equipment and emergency response equipment. The liquid scintillation counter was replaced due to water damage in 5/2018.

proper The storage area contains racks for the storage of solid and liquid waste. Waste streams consist of dry solid, bulk liquid and liquid scintillation vials. Dry solid waste and the liquid scintillation vials are packed in standard 55-gallon drums. Liquid waste is stored in five-gallon carboys and placed in spill trays to contain leakage. The floor of the waste facility was repaired for cracks and resurfaced in 2/2016. Radioactive animal carcasses are kept in a designated freezer in the ARC until they are disposed. More than half of the racks, which were not being used, were disassembled in 2017. In addition, old, broken, and unwanted equipment and materials were disposed.

Wolstein Building Waste Facility:

Room 1120, in this facility, is a counting room that also contains a chemical hood. Room 1119 contains a walk-in chemical hood and a liquid process/storage area, and Room 1118 is used for solid process/storage activities. The liquid process/storage area and solid process/storage areas are used for short-term storage only.

Room 1120 has also been developed as a combined chemical and RAM emergency response center. It contains a liquid scintillation counter and computer that provides access to our OnSite web database and safety data sheets in the event of radioactive/ chemical spills.

<u>IODINATION EQUIPMENT</u>

Special hoods, air pumps and activated charcoal-filter exhausts are placed in laboratories that conduct iodinations. Four iodination hoods are in storage. Their locations are as follows:

WRB 1119 - Radiation Waste Facility Storage (1) DOA 990 - Storage (2) Bishop S629C - Storage (1)

ANIMAL RESOURCE CENTERS

Conventional animal care facilities are in the following buildings: Robbins, Wearn, Wickenden, Metro Health Hospital, the Small Animal Imaging Research Center (SAIRC), and the Wolstein Research (WRB). These facilities are used by AUs to conduct animal studies with radioactive, chemical, and biological materials. A variety of animals (mice, rats, hamsters, rabbits, groundhogs, ferrets, and large animals such as sheep, dogs, and pigs) are housed in the Robbins building as needed. The Wearn, Wickenden, and Wolstein facilities predominantly house mice and rats. Contaminated items are stored in the ARC freezer in Robbins until disposal. Animals used in studies involving radioactive materials are not housed in the Wolstein facility. Robbins houses one irradiator behind the ultra-barrier that is currently not in use.

EQUIPMENT CALIBRATION

Annual calibration procedures consist of an electronic assessment of survey instruments, plus a measurement of their performance using calibrated isotope reference standards. Survey meters that require dose rate calibrations or repairs are not calibrated by the RSOF. These instruments are sent to an appropriate vendor by the AUs' laboratory. Instruments requiring simple repairs are repaired in-house.

The Packard Cobra II auto gamma counter is in the service building's radiation laboratory. The new Perkin Elmer Tricarb 4910 is in the radiation laboratory. The old LSC was moved to the WRB laboratory, while the WRB LSC was moved to the DOA990 office.

Quality control checks are conducted monthly for the EHS liquid scintillation and gamma counters in the radiation laboratory, DOA 990 and WRB 1119. The continuous air monitor (CAM) in DOA 990 is out of service until further need arises. All iodination air pumps are out of service. Air flow meters are annually calibrated, so calibration of iodination pumps can be done when needed. The LSCs in the radiation safety laboratory, WRB 1120 and in DOA 990 are on service contracts and maintained.

the laboratory is contacted. An inspection sticker and the RAM package receipt form is placed on the package to confirm that inspection has been completed by the RSOF. The campus mail group delivers packages to most laboratories. Laboratories located across Adelbert Road or Cornell Road use direct pickup. Direct pickup by a laboratory designee alleviates the need to complete the bill of lading since the package is carried to the laboratory and not transported in a vehicle. The AU or designee is required to survey all radioactive material packages upon receipt for contamination and evidence of damage or breakage.

Radioisotope use, for biomedical research, results in frequent movement of radioactive materials to and from the campus. The broad scope license requires that shipments be surveyed within three hours of arrival. In the past year, 32 isotope shipments were inspected and approved by the RSOF upon receipt on the campus. A few shipments/transfers off campus were also made by laboratories. The RSOF assisted these laboratories by making sure that paperwork was properly prepared and proper labeling was used on the packages.

DISPOSAL OF RADIOACTIVE MATERIALS

Exclusive of decay of isotope in laboratories and minor inventory changes, isotopes were removed from laboratories by either 31 isotope waste pickups by the RSOF staff, or by 15 AU-directed disposals into the sanitary sewers. The following table presents a breakdown by isotope of radioactive materials entering and leaving laboratories.

SEALED SOURCES

CWRU's sealed source inventory contains 77 sealed sources. Of these, 73 sealed sources are required to be inventoried every six months. Four sealed sources require six-month leak tests as stated in our ODH license. This includes 4 gamma sources.

There are three high-dose irradiators and two low-dose irradiators on campus. Both low-dose irradiators and one of the high-dose irradiators are not in use. There are two active high-dose irradiators. These irradiators are the only radioactive material sources that could produce significant external dose hazards should their shielding be compromised.

 60 Co dose irradiators (out of service). Currently, two high dose irradiators are in use and the third is out of service. The 60 Co irradiator is now considered low dose. There were 22 irradiator users.

The number of Individual workers authorized to use irradiators are shown in the following table.

so that the RSOF can take timely action consistent with implementation of ALARA in the event any significant exposure to radiation is detected by the dosimeter.

The contract for dosimetry was renewed with Landauer, Inc., which provides radiation monitoring services. The dates of the contract are for 7/1/2015 to 6/31/2018 with two one-year renewal options. We are on renewal option as of 7/1/2018. The contract was extended to 6/2023 due to post Covid-19 pandemic.

PREGNANT WORKER PROGRAM

Any radiation worker who is, or thinks she may be, pregnant is advised to complete a declaration of pregnancy form found on the EHS website https://case.edu/ehs/ under the 'radiation safety' link and send it to the RSOF. Counseling is provided and an additional dosimeter is issued to the worker that is read every month. This additional fetal dosimeter is worn to conservatively measure any dose to the developing baby. One woman confirmed pregnancy.

NEUTRON USERS

For experiments and procedures involving the use of neutron sources, personnel monitors sensitive to neutron radiation must be worn. These can be obtained from the RSOF. There were 2 neutron dosimeters used in the Surgical Training and Research Laboratory (STAR) during the fiscal year.

USERS OF RGE/ X-RAY

The RSOF provides special dosimeters for individuals carrying out experiments and procedures involving the use of RGEX-ray (X-ray), such as fluoroscopy and X-ray diffractometers. The 4 fluoroscopy users had collar badges. We ceased the badging of fluoroscopy observers and chose to use area monitors for the STAR Facility as of 2019.

Although only 20 percent of the workers currently monitored are required to wear dosimeters to comply with the terms of the CWRU's broad scope license or RGE programs, the use of dosimeters is encouraged as it provides an excellent method for early detection of activities that might be dangerous to individual workers.

PERSONNEL MONITORING	21/22	20/21	19/20	18/19	17/18	16/17	15/16	14/15
Pregnant Workers	1	0	1	1	1	0	0	0
Neutron	2	2	2	2	2	2	2	2
RGE/ X-ray	25	25	175	76	251	32	25	37
Dental	47	51	38	35	41	27	37	28
General	342	399	325	284	347	485	460	473

CWRU uses Luxel badges, which are state-of-the-art detection technology for personnel dosimetry. Luxel badges can measure minimum detectable limits of 1.0 mRem. ODH

regulations require that all monitored workers be advised annually of their occupational dose exposure. All workers were sent a copy of their prior calendar year's dose report in 2021.

RADIATION GENERATING EQUIPMENT

Machines that produce ionizing radiation (RGE) require safety labeling using appropriate warning indicator systems augmented by testing for radiation leakage during operation. Analytical research units include X-ray diffraction. As of 8/2015, X-ray registration is no longer required for electron microscopes. There are also X-ray units in use for healthcare and diagnostic research. There are currently nine AUs of RGE with equipment in 19 laboratories. RGE is inventoried semi-annually and surveyed annually for leakage. Investigators in charge of RGE, not the RSOF, are required to provide site-specific training programs for workers using this equipment. The EHS provides general safety classes for individuals using RGE.

RADIATION- GENERATING UNITS (Not In Use)	21/ 22	20/ 21	19/ 20	18/ 19	17/ 18	16/ 17	15/ 16	14/ 15
Diagnostic units Disposed	0	25	0	0	0	0	2	0
Diagnostic units Purchased	0	0	0	0	0	0	1	3

The ODH has changed the radiation generating units' classification. There was 1 unit purchased and 1 unit disposed of for 2021-2022. The table below reflects that change.

RADIATION GENERATING EQUIPMENT (IN USE)	21/22	20/21	19/20	18/19	17/18	16/17	15/16	14/15
Closed Beam Analytical	5	5	5	6	6	6	6	6
Dental Computer Tomography (CT)	2	2	5	5	2	2	2	1
Photoelectron Spectrometer (No longer under ODH)	1	1	4	0	0	16	16	10
Fluoroscopy	1	1	2	2	2	2	2	3
Hand-held Dental	8	8	8	13	4	3	2	3
Hand-held Dental (Inoperable)	1	1	1	1	0	1	1	0

AIR EXPOSURE CONTROL & MONITORING

During the 2021 calendar year, RAM released into the air were less than 10 percent of the maximum levels set by the EPA. Therefore, CWRU had no reports to file and the University was in compliance with the air effluent releases stipulated by the EPA Clean Air Act, the NRC and the ODH.

Regarding airborne exposure control, the primary concern is to safeguard against exposure to airborne radioactive iodine that is used for protein iodination experiments. To control exposures, the RSOF requires that reactions involving use of volatile radioactive iodine isotopes be performed in an iodination hood that is housed in a chemical hood. The charcoal-filtered exhaust from the iodination hoods typically reduces radioactive material emissions by approximately 90 percent. Experiments requiring use of large amounts of iodine in especially volatile form are routinely carried out in closed systems to prevent airborne release of radioactive iodine. There were no experiments requiring the use of volatile iodine conducted this fiscal year. This program had been inactive since 2021.

BIOASSAY PROGRAM

Bioassays are required for employees who may receive an internal, measurable radiation dose. Bioassay procedures include, but are not limited to, thyroid screening and urinalysis. The RSOF can perform bioassays for radioactive iodine (thyroid scan) and tritium uptake (urinalysis). Bioassay records are retained in the RSOF and are available for review by the assayed individuals. The Bioassay Program has been inactive since 2021.

RADIOACTIVE IODINE

During 2021-2022, there were no active iodination laboratories. The RSO maintains an inventory of four iodination hoods to be deployed when needed. A bioassay is required when more than one mCi of radioactive iodine is used in volatile form. The RSOF must be notified prior to:

- x Handling more than 1.0mCi of volatile radioactive iodine.
- x The following must be completed prior to the procedure:
 - o Performance of a baseline bioassay for anyone involved in the procedure that does not have a baseline radioactive iodine bioassay on file
 - o Arrangements for monitoring of effluent releases to the atmosphere during the first iodination procedure using a new protocol to measure and mitigate any release to the environment

After an iodination procedure, individuals involved in the procedure must contact the RSOF and arrange for a bioassay to be completed by the end of the next business day. There were no iodination procedures performed this fiscal year. No workers exceeded 10 percent of the ODH limits.

IODINATION PROCEDURES	21/22	20/21	19/20	18/19	17/18	16/17	15/16	14/15
Total	0	0	0	1	0	0	0	0

125	21/22	20/21	19/20	18/19	17/18	16/17	15/16	14/15
BIOASSAYS								
RSOF Staff	0	16	16	16	16	16	16	16
Additional	0	0	0	2	0	0	0	0
Total	0	16	16	18	16	16	16	16

TRITIUM

Urine bioassays must be carried out for individuals using more than 10mCi of tritium, with a baseline bioassay required prior to experiment. There were no urine bioassays required during this fiscal year.

RADIOACTIVE MATERIALS INCIDENTS

EMERGENCY RESPONSE

Emergency response procedures have been developed and approved by the RSOF and RSC for spills, releases or loss of RAM, small fires, large fires, internalized contamination, and medical emergencies. The goal during any emergency response is to protect people first and property second. The RSO or designee provides instruction, assistance, and supervision of clean up as required. The RSO is authorized to act independently and take prompt remedial action in situations involving RAM that present imminent danger or threat to personnel, property, or the community at large.

INCIDENT/ SPILL RESPONSE

MAJOR INCIDENT/ SPILL

This is a spill that involves personnel contamination or results in contamination outside of the intended work area that cannot be easily and effectively contained and cleaned up.

MINOR INCIDENT/ SPILL

This is a spill that does not involve personnel contamination and that remains inside the intended work area; one that can be easily and effectively contained and cleaned up without assistance from the RSOF. It also includes events that trigger irradiator alarms, most of which are caused by mechanical failures and installation of new high security equipment.

There were no major incidents and fifteen minor incidents documented over the past year.

	21/22	20/21	19/20	18/19	17/18	16/17	15/16	14/15
INCIDENTS								
Major	0	0	0	0	0	0	0	0
Minor	15	19	7	11	20	21	22	30
TOTAL	15	19	7	11	20	21	22	30

DATE	INCIDENT	CONTAMINATION	ROOT CAUSE	FOLLOW UP
6/22/2022	Minor Incident	IRR Tamper Alarm	Tamper Alarm and	Internet returned and will
			communication	monitor computer use.
-//		0: " 14/ : 1	loss.	
5/23/2022	Minor Incident	Standing Water in IRR room	Standing water in IRR room from	Mopped up water and
		IKK room	leaking Autoclave	informed staff of leaking cooler for repair.
			cooler.	cooler for repair.
5/17/2022	Minor Incident	Toxic Gas Alarm	Evacuated Service	Confirmed leak was
			Bldg. for 2 hours	plugged, vapors
			due to chemical	dissipated with 4 hours,
			leak from water	half of EHS staff
			treatment in the basement.	remained.
4/19/2022	Minor Incident	IRR Alert	Battery Tamper	Battery Tamper switch
			switch broken.	replaced.
4/13/2022	Minor Incident	LSC unapproved	During room survey,	Reviewed proper
		move	noticed LSC had been moved to	procedure with staff.
			another room.	
			anounce room.	
2/28/2022	Minor Incident	IRR Alarm	ID scanned twice	Reviewed proper
			causing alarm.	procedure with staff.
2/20/2022	Minor Incident	Legacy waste found	14C standard, 35S	14C standard, 35S lead
			lead pig, 35S waste found in non-rad	pig, 35S waste found and was disposed as legacy
			laboratory.	was disposed as legacy
2/16/2022	Minor Incident	IRR Tamper Alarm	Tamper Switch	Tamper alarm replaced.
		·	broken.	·
2/9/2022	Minor Incident	X-Ray Room	X-Ray room left	Reviewed proper
		unsecured	unlocked with X-	procedure with staff.
1/20/2022	Minor Incident	IRR Alarm	Ray light on. ID scanned twice	Reviewed proper
1/20/2022	willor incluent	INN AIdIII	causing alarm.	procedure with staff.
1/4/2022	Minor Incident	Unapproved Rad	Tousding diami.	procedure with stain.
		pp.0.00		

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EHS WEBSITE & NEWSLETTER

The EHS home website (https://case.edu/ehs/) provides integrated web-based access to EHS services. Information on training classes, online retraining and safety manuals is available at this site. All information is updated on a regular basis.

The EHS newsletter is filled with articles that are designed to keep the campus community abreast of safety issues and concerns. It covers the latest government regulations, addresses various concerns that are found during laboratory inspections and provides answers to questions frequently asked by laboratory personnel. Articles that were submitted during this year included:

- x Campus Use of Radioactive Materials
- x Radiation Clearances

LASER SAFETY PROGRAM

There are 236 lasers/laser systems in our database for the campus used by 45 laser Pls in 19 buildings (39 Active, 6 Storage). There are 26 3B/4 Pls and 19 1-3R Pls. The lasers of greatest

WASTE MANAGEMENT

RADIOACTIVE WASTE FACILITY

Our radiation waste facility decay-in-storage licensing with the ODH specifies that we must dispose of any interim generated waste as soon as practical when a waste site is open. The CWRU Radioactive Waste Facility (RWF) is used to segregate waste streams and prepare the waste for disposal. The different waste streams include aqueous waste, sharps, animals, scintillation vials, and dry solid waste.

³²P solid waste is held for decay (for at least 10 half-lives) in the radioactive waste facility. The waste is surveyed and subsequently sent to Medwaste Ohio, a commercial disposal facility for incineration. Currently, only the outside of waste bags is surveyed (with approval from ODH) followed by immediate placement into a burn box. This simplifies handling by staff and provides for compliant and economical disposal of these materials. This procedure has greatly

WASTE GENERATED IN JULY 1, 2021 - JUNE 30, 2022

	GENERATED 7/1/2021 6/30/2022	DISPOSED: MEDWASTE OHIO	DISPOSED: SEWER	DISPOSED: CHEMICAL SAFETY	DISPOSED: Ecology Services	IN STORAGE AS OF 6/30/2021
Short-Lived Dry	3	3	3	0	0	0
Long-Lived Dry	2	0	2	0	2	0
Scintillation Vials	2	0	2	0	2	0
Animals	0	0	0	0	0	0
Long-Lived Sewer	20	0	20	0	0	0
Long-Lived Non-Sewer	0	0	0	0	0	0
Short-Lived Sewer	5	0	5	0	0	0
Short-Lived Non-Sewer	0	0	0	0	0	0

All values in the dry waste, vial and animal categories denote the number of 55-gallon drums. All values for the liquid waste categories are in gallons. The single asterisk (*) demarcates the number of drums generated prior to 7/1/2021, kept for decay in storage and disposed during the period of 7/1/2021-6/30/2022. During this fiscal year, all long-lived hazardous aqueous waste was disposed.

Ecology Services animal waste cost = \$22/lb. for 10-pound barrel = \$220 per 10-pound barrel Ecology Services dry waste cost = \$470 per 55-gallon drum

The cost of disposal for one box of biomedical waste at Medwaste Ohio is \$25 per container (average of 2 containers per 55-gallon drum). There were 3 drums of decay-in-storage dry waste surveyed and disposed of during 2020-2021. Thus, the indirect savings to researchers due to the decay in storage program was \$1,260.

WASTE GENERATION	21/22	20/21	19/20	18/19	17/18	16/17	15/16	14/15
Short-Lived Dry	3	5	4	6	18	9	11	10
Long-Lived Dry	2	2	6	8	6	5	9	6
Scintillation Vials	2	2	6	6	6	12	9	10
Animals	0	0	0	0	0	1	0.25	1
Long-Lived Sewer	20	35	25	35	28	30	23.75	25
Long-Lived Non-Sewer	0	0	1	5	2	2	2	2
Short-Lived Sewer	5	10	20	30	25	21	18	20
Short-Lived Non-Sewer	0	0	1	1	2	0	4	5

The contract for radioactive waste disposal has been extended for 6/2016 to 6/2019 with two one-year renewal options with Ecology Services. This contract provides for disposal of all long-lived dry materials, scintillation vials and animal wastes. The contract was extended to 6/2023 due to post COVID-19 pandemic.

RECYCLING PROGRAM

The RSOF occasionally obtains laboratory equipment in very good condition from AUs who have either left the University or ceased to use RAM. The equipment includes radioactive waste

RADIATION SAFETY COMMITTEE AUDITS

The RSC audits are carried out in two different ways:

- x Individual RSC members conduct performance audits on-site at the RSOF at various times throughout the year.
- x A compliance inspection of RSOF records is conducted shortly after the end of each fiscal year by a team of RSC Members.

Performance audits of RSOF activities included the following areas:

AREA AUDITED

OF INDIVIDUAL FILES EXAMINED

EHS Webpage
Incident Reports
Irradiator User Training/Irradiators
Licensing Status
Radiation Generating Equipment (RGE) Inventory & Training
Sealed Source Leak Tests
Support Staff Training
Survey Meters
Valid RAM Applications
Waste Disposal Facilities

Dosimetry Program

An audit of Current Dose records held by the RSOF was performed on October 12th, 2021, to verify that AU laboratory workers were current in dose record and active radiation badges. Dr. Lee audited the record and identified one (1) individual (authorized user) who did not pick up their badges. The RSOF was notified of this individual for follow up.

RSOF RESPONSE:

The badge owner was notified by phone and returned the badge.

EHS Webpage

Dr. Zhenghong Lee inspected the operation of the EHS web pages for the radiation safety section. Dr. Lee examined 10 random sites on October 12th, 2021, within the web pages and associated links and reported some discrepancies regarding quiz grades from prior training not being dated. The RSOF was notified of this observation.

RSOF RESPONSE:

The Canvas grading program was reviewed and had not been republished for the current year. Each training type was republished for the present year thus correcting the discrepancies.

Incident Reports

A review of monthly incident reports was performed by Dr. Christine Duval on October 14th, 2021, for verification and documentation of follow-up by the RSOF. During this period there were a total of three (3) incidents reported. The incidents were effectively resolved in a timely manner.

RSOF RESPONSE:

No response required.

Irradiator User Training/Irradiator Program

An audit of the Irradiator Information Files was performed by Dr. Fisher to verify that the irradiators were audited by the RSOF within the past six months. The audit was performed on October 6th, 2021. Four Irradiators were active on campus and each file was up-to-date and compliant, Dr. Fisher noted no deficiencies.

RSOF RESPONSE:

No response required.

Licensing Status

An audit was conducted to verify the licensing status of all ODH licenses and registrations on October 6th, 2021. Components of the audit include: Broadscope license, RGE license, Waste license, Radiation Manual, X-ray Manual, Laser Manual, Radiation Training, X-Ray Training, Radiation Online Training, UV online training and RSC guidelines. Dr. Suhrim Fisher reviewed all license programs and noted that all licenses were current (no deficiencies).

RSOF RESPONSE:

No response required.

Radiation Generating Equipment (RGE) Inventory and Training

Quarterly inventory status and equipment surveys were examined by Dr. McCormick who examined 9 files on October 20th, 2021. Dr. McCormick noted one individual that needed X-ray training, and three units that required a compliance update in Dr. Syed's laboratory. The RSOF was alerted to these deficiencies.

RSOF RESPONSE:

The individual was notified to complete Xray training, and the three units were inventoried during the Xray inspection.

Sealed Source Leak Tests

Files verifying that sealed sources had been leak tested were audited on October 20th, 2021. Ten (10) files were examined by Dr. Licatalosi who reported one (1) deficiency. The RSOF was notified of the deficiency.

RSOF RESPONSE:

The leak test for the deficient sealed source was completed and compliant.

Support Staff Training

An audit was conducted to verify the training status of personnel encompassing ancillary segments of the radiation safety program including; Animal Resource Center (ARC), Shipping & Receiving, Custodial, Security and Plant Security on October 26th, 2021. Dr. Valadkhan reported twenty-two (22) deficiencies in overdue worker training. These individuals overdue for training were identified to RSOF for notification of overdue training and the workers were sent notices.

RSOF RESPONSE:

Following up on the overdue workers was done by email and phone calls to determine if they were still at CWRU. Some of the workers had left CWRU. Those that had left were archived, while all the others were notified and did retrain. The RSOF will attempt to impose more

frequent monitoring of this group of ancillary workers to reduce the number of non-compliant trainings.

Sealed Sources Leak Tests Security Checks Semi-Annual Mailings (Air/Sewer Inventory) Survey Meters

Each audit consisted of randomly selecting five to 20 files from the past year to ensure its contents were up-to-date, accurate and consistent with the database.

Active/Decommissioning Room Surveys

An audit was performed on February 10th, 2022, to validate active RAM use files and Decommissioned room files to verify that the laboratory was surveyed within the last six months as well as verification for any follow-up on non-compliance issues. Dr. Christine Duval examined 20 files and noted 4 deficiencies. These were reported to the Radiation Safety office for follow up.

RSOF RESPONSE:

Decommissioned rooms that were still labeled as active were corrected in the database.

AU/Worker Training

Authorized users and worker training files were audited for up-to-date training on radiation safety procedures on February 8th, 2022. Dr. Croniger reported ten (10) overdue workers, who were notified by RSOF to update their training status.

RSOF RESPONSE:

Following up on the overdue workers was done by email and phone calls to determine if they were still at CWRU. Those that had left were archived, while the others did retrain.

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No response required.

Irradiator User Training/Irradiators

An audit of the Irradiator Information Files was performed by Dr. Licatalosi to verify that the irradiators were audited by the RSOF within the past six months. The audit was performed on February 10th, 2022. Four Irradiators were active on campus and each file was up-to-date and compliant. Ten user files were audited, and no deficiencies noted.

RSOF RESPONSE:

No response required.

Incident Reports

A review of monthly incident rend no 8Ples was perf8 Tm0 Tc0 TwE monthly inc6 refBT63t the C thick.3(tive o

No 7 Tw[RSOF RES)-5.5.3 aud72 480.12 80.1 Teted.ciesd correcily.Tc.007 Tw[RSOF RES)-5.8(P)-.4(ON)-5w

RSOF RESPONSE:

Following up on the overdue workers was done by email and phone calls to determine if they were still at CWRU. Those workers that had left were archived, while the remaining workers did retrain.

Radiation-Generating Equipment (RGE) Inventory and Training

Quarterly inventory status and equipment surveys were examined by Dr. Shurim Fisher who examined 10 files on February 2nd, 2022. Dr. Fisher noted two (2) instances of overdue inspections required. The RSOF office was alerted to these deficiencies.

RSOF RESPONSE:

The noted X-Ray User Inspections were completed with the month.

Sealed Source Leak Tests

Files verifying that sealed sources had been leak tested were audited on February 8th, 2022. Ten (10) files were examined by Dr. Croniger who reported no deficiencies.

RSOF RESPONSE:

No response required.

Security Checks

Verification and documentation of radioisotope security checks were performed on February 2nd, 2022. Dr. Fisher noted no deficiencies.

RSOF RESPONSE:

No response required.

Semi-Annual Mailings (Air/Sewer Inventory)

An audit of the air/sewer disposal inventory was on February 10th, 2022, by Dr. Duval. Fifteen (15) files were reviewed by Dr. Duval who noted no deficiencies.

RSOF RESPONSE:

No response required.

Survey Meters

Dosimetry Program

An audit of Current Dose records held by the RSOF was performed on April 26th, 2022, to verify that AU laboratory workers were current in dose record and active radiation badges. Dr. McCormick audited ten (10) records and reported one (1) user that failed to pick up a badge. This worker was notified and picked up the badge.

RSOF RESPONSE:

The worker was promptly notified and came to collect their badge.

Incident Reports

A review of monthly incident reports was performed by Dr. Licatalosi on April 25th, 2022, for verification and documentation of follow-up by the RSOF. During this period there were a total of five (5) incidents reported. Dr. Licatalosi noted that the last incident reported (2/10/2022) had not had a follow-up report performed as of April 2022.

RSOF RESPONSE:

The response to the incidents was captured via email and the email was attached to the incident report.

Licensing Status

An audit was conducted to verify the licensing status of all ODH licenses and registrations on April 18th, 2022, by Dr. Croniger Components of the audit include: Broadscope license, RGE license, Waste license, Radiation Manual, X-ray Manual, Laser Manual, Radiation Training, X-Ray Training, Radiation Online Training, UV online training and RSC guidelines. Dr. Croniger reviewed all license programs and noted that all licenses were current (no deficiencies).

RSOF RESPONSE:

No response required.

Security Checks

Verification and documentation of radioisotope security checks were performed on April 26th, 2022. Dr. McCormick reports no security checks during this period.

RSOF RESPONSE:

No response required.

Semi-Annual Mailings (Air/Sewer Inventory)

An audit of the air/sewer disposal inventory was performed on April 12th, 2022, by Dr. Lee. Ten (10) files were reviewed by Dr. Lee who noted one (1) file could not be found (custodial services). The RSOF was notified of this deficiency.

RSOF RESPONSE:

The misfiled Custodial Services was found and filed correctly.

Support Staff Training

An audit was conducted to verify the training status of personnel encompassing ancillary segments of the radiation safety program including Animal Resource Center (ARC), Shipping/Receiving, Custodial, Security and Plant Security on April 12th, 2022. Dr. Fisher examined ten (10) files and reported no deficiencies. Dr. Fisher did note that the SOP title should be changed to match the new Table of Contents for the Audit Menu.

RSOF RESPONSE:

The Support Staff Training Standard Operating Procedure (SOP) title was updated to match the Audit Title.

Valid RAM Applications

RAM applications were audited on April 18th, 2022, to verify that the applications were complete and valid. Dr. Valadkhan audited ten (10) files and reported seven (7) deficiencies. Dr. Valadkhan noted that all the deficiencies were related to out-of-date paper records compared to the electronic files. The RSOF office was notified of these deficiencies for follow up.

RSOF RESPONSE:

Completed reports and correspondence had not been filed. The records were updated once all completed reports and correspondence were promptly filed in the appropriate files.

Waste Disposal Facilities

The waste disposal facilities (DOA990/Wolstein) and RSOF Laboratory were inspected to ensure safe operation and maintenance as required by RSOF on April 12th, 2022. Dr. Lee inspected the facilities and reported that all records of maintenance, housekeeping, records and waste storage and handling were all in compliance. Dr. Lee noted that only two waste pick-ups had occurred since the last inspection.

RSOF RESPONSE:

No response required.

Overall, this bi-annual part of the audit process was successful. Records were easily accessed and reviewed. The program was found to be efficient. Productive interaction among committee members and the RSOF staff during the audit process expedites the procedure. All corrections to the files and the Onsite database were made following each trimester audit.

ANNUAL RADIATION SAFETY PROGRAM AUDIT REPORT

The RSC conducted its annual audit of the RSOF in June 2022. The committee reviewed the performance of 20 components of the RSOF. Please note that surveys for October, January, April/May and the annual audit were performed as scheduled in person on campus with proper PPE and social distancing measures enacted. The RSC members are to be commended for their participation and response to the duties of the committee over the course of the COVID 2019 pandemic. The areas audited were:

- x Ancillary Staff Training
- x AU and Worker Training
- x Bioassays
- x Compliance Review
- x Isotope Orders, AU Possession Limits, and the database
- x Dosimetry Program
- x Incident Reports
- x Irradiator Program Review

- x Laser Program Review
- x Licensing Status
- x Radioisotope Security Checks
- x Radiation Generating Equipment Inventory and Training
- x Radiation Survey Meters
 x Room Surveys
- x EHS Radiation Webpage
- x Sealed Sources
- x Direct Pickup & Package Receipt
- x Semi-Annua6

RSOF RESPONSE:

No response required.

Compliance

Compliance review audits were reviewed for the period July 1st, 2021-June 30th, 2022, to ensure that any non-compliance issues were appropriately resolved. Upon examination of 50

Incident Reports

A review of monthly incident reports From July 1

Licensing Status

An audit was conducted to verify the licensing status of all ODH licenses and registrations during the period July 1st, 2021-June 22nd, 2022. Components of the audit include: Broadscope license, RGE license, Waste license, Radiation Manual, X-ray Manual, Laser Manual, Radiation Training, X-Ray Training, Radiation Online Training, UV online training and RSC guidelines were reviewed by Dr. Valadkhan, and all license programs and licenses were current.

RSOF RESPONSE:

No response required.

Radiation Generating Equipment (RGE) inventory and training

Quarterly inventory status and equipment surveys were examined by Dr. Valadkhan who examined 50 files for the period July 1st, 2021-June 22nd, 2022. Dr. Valadkhan noted eight (8) non-compliant devices. The RSOF was informed of the devices and location.

RSOF RESPONSE:

Several X-Ray inspections that were past due were completed within the month and filed promptly.

Room Surveys

An audit was performed to validate active RAM use files and Decommissioned room files for the period July 1st, 2021-June 22nd, 2022, to verify that the laboratory was surveyed within the last six months as well as verification for any follow-up on non- compliance issues. Dr. McCormick examined fifty (50) files and noted two (2) deficiencies. The RSOF office was advised of the concerns.

RSOF RESPONSE:

The unfiled completed surveys were found and filed properly.

Sealed Source Leak Tests

Files verifying that sealed sources had been leak tested were audited for the period of July 1st, 2021-June 7th, 2022. Fifty (50) files were examined by Dr. Fisher who reported five (5) overdue tests. The RSOF was notified of these deficiencies.

RSOF RESPONSE:

No response required.

Radioisotope security checks

Verification and documentation of radioisotope security checks were performed for the period July 1st, 2021-June 22nd, 2022. Dr. Valadkhan audited the security checks and noted that security checks in April and May of 2022 were missing documentation. This observation was reported to the RSOF.

RSOF RESPONSE:

Resolutions for the security checks were updated and submitted.

Semi-Annual Mailings (Air/Sewer Inventory)

An annual audit of the air/sewer disposal inventory was performed for the period July 1st, 2021-June 17th, 2022. Thirty-eight (38) files were reviewed by Dr. Licatalosi who noted three (3) questions concerning overdue reports. The RSOF was notified of these deficiencies.

RSOF RESPONSE:

Emails were sent to the three storage users requesting reports.

Radiation Survey Meters

Compliant calibration of survey meters was audited for the period July 1st, 2021-June 22nd, 2022. Fifty (50) files were examined by Dr. Valadkhan who noted no deficiencies.

RSOF RESPONSE:

No response required.

Valid Ram Applications

RAM applications were audited for the period July 1st, 2021-June 22nd, 2022, to verify that the applications were complete and valid. Dr. McCormick audited thirty-five (35) files and reported no deficiencies.

RSOF RESPONSE:

No response required.

Waste Disposal Facilities

The waste disposal facilities (DOA990/Wolstein) and RSOF Laboratory were inspected to ensure safe operation and maintenance as required by RSOF for the period July 1st, 2021-June

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RSOF RESPONSE:

No response required.

SUMMARY

No major problems exist in the RSOF program and the RSOF staff is functioning on a very competent level.

RSOF RESPONSE:

The RSOF thanks the RSC for its careful audit of safety activities over the past year. Deficiencies uncovered during the audit were referred to the RSOF auditor for increased

APPENDIX

AUTHORIZED USERS WITH STATUS CHANGE DURING FISCAL 2021-2022

RADIATION ACTIVE

None

STORAGE MODE

Derek Abbott (12/7/2021)

RADIATION INACTIVE

Willem Henry Boom (7/22/2021) Alvin Schmaier (5/19/2022) Danny Manor (10/11/2021) Neena Singh (11/9/2021) Peter McCall (6/1/2022)

DEPARTED

Shu Chen 11/10/2021)

X-RAY AUTHORIZED POSSESSOR LIST

<u>AP NAME</u>	<u>CONTACT PERSON</u>	<u>UNITS</u>	
Gary Chottiner	Gary Chottiner	4	Retired 6/30/2022, transferred to Corbin Covault
Syed Ali	Susan Opsitnick	61	
Zhenghong Lee	Chris Flask	3	
Suparna Mahalaha	Aeysha Kisner	4	
Jeffrey Pigott	Jeffrey Pigott	4	
Anna Samia	Anna Samia	1	
Daniel Scherson	Daniel Scherson	1	Storage
Steve Schomisch	Steve Schomisch	2	
Lei Zhu	Lei Zhu	6	

LASER USERS